

UNITED STATES DISTRICT COURT

Minnesota

DISTRICT OF

Russian Research Center
The Kurchatov Institute

V.

Western Services Corporation

SUBPOENA IN A CIVIL CASE¹

CASE NUMBER: AMD 02 CV 3878

(Pending in the United States District
Court for the District of Maryland)

Custodian of Record

TO: Xcel Energy Corporation p/k/a Northern States Power
Sherburne County Generating Station
13999 Industrial Blvd.
Becker, MN 55308

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver
120 E. Baltimore Street
Baltimore, MD 21202-1643

DATE AND TIME
06/16/03 - 10:00 a.m.

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

John M.G. Murphy, Esq.
Ober, Kaler, Grimes & Shriver
120 E. Baltimore Street, Baltimore, MD 21202-1643

410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of SIMPORT (as defined above) in the possession, custody or control of XCEL ENERGY CORPORATION F/K/A NORTHERN STATES POWER, in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, relating to or reflecting the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts.
3. All documents, agreements or contracts between XCEL ENERGY CORPORATION F/K/A NORTHERN STATES POWER and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by XCEL ENERGY CORPORATION F/K/A NORTHERN STATES POWER in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by XCEL ENERGY CORPORATION F/K/A NORTHERN STATES POWER to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

UNITED STATES DISTRICT COURT

DISTRICT OF Western District of Pennsylvania

Russian Research Center
The Kurchatov Institute

V.

Western Services Corporation

SUBPOENA IN A CIVIL CASE

CASE NUMBER: AMD 02 CV 3878

(Pending in the United States District
Court for the District of Maryland)TO: Custodian of Record
Allegheny Energy Supply Company LLC
Armstrong Generating Station
P.O. Box 729
Kittanning, PA 16201☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver
120 E. Baltimore Street
Baltimore, MD 21202-1643DATE AND TIME
06/16/03 - 10:00 a.m.☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S NAME AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

John M.G. Murphy, Esq.
Ober, Kaler, Grimes & Shriver

120 E. Baltimore Street, Baltimore, MD 21202-1643

410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of ALLEGHENY ENERGY SUPPLY COMPANY LLC or any successor, predecessor or subsidiary, in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
3. All documents, agreements or contracts between ALLEGHENY ENERGY SUPPLY COMPANY LLC and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by ALLEGHENY ENERGY SUPPLY COMPANY LLC in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by ALLEGHENY ENERGY SUPPLY COMPANY LLC to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Issued by the
UNITED STATES DISTRICT COURT
DISTRICT OF Columbia.

Russian Research Center
The Kurchatov Institute
V.
Western Services Corporation

SUBPOENA IN A CIVIL CASE

Case Number:¹ AMD 02 CV 3878

(Pending in the United States District
Court for the District of Maryland)

TO: Custodian of Record
Electric Power Research Institute
2000L Street, N.W., Ste. 805
Washington, D. C. 20036

☐ **YOU ARE COMMANDED** to appear in the United States District court at the place, date, and time specified below
testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☐ **YOU ARE COMMANDED** to appear at the place, date, and time specified below to testify at the taking of a deposition
in the above case.

PLACE OF DEPOSITION	DATE AND TIME

☐ **YOU ARE COMMANDED** to produce and permit inspection and copying of the following documents or objects at the
place, date, and time specified below (list documents or objects):
See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street Baltimore, MD 21202-1643	DATE AND TIME 06/09/03 - 10:00 a.m.
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☐ **YOU ARE COMMANDED** to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers,
directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated,
the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE 05/08/02
	

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

John M.G. Murphy, Esq.

Ober, Kaler, Grimes & Shriver

120 E. Baltimore Street, Baltimore, MD 21202-1643

410-347-1334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

	DATE	PLACE
SERVED	May 9, 2003 at 10:23 am	1025 Vermont Avenue NW 4th Floor Washington, DC 20005
SERVED ON (PRINT NAME)		MANNER OF SERVICE
Robin Brown, Authorized Representative CT Corporation System, Registered Agent		personal
SERVED BY (PRINT NAME)		TITLE
Kirk A. Hornbeck		private process server

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on May 9, 2003
DATE


SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in

person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT

Northern DISTRICT OF California

Russian Research Center
The Kurchatov Institute

V.

Western Services Corporation

SUBPOENA IN A CIVIL CASE'

CASE NUMBER: 1 AMD 02 CV 3878

(Pending in the United States District
Court for the District of Maryland)

TO: Custodian of Records
Pacific Gas and Electric Company
one Market Street Tower, Suite 2400
San Francisco, CA 94105

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
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☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street Baltimore, MD 21202-1643	DATE AND TIME 6/16/03 10:00 a.m.
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☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
---	------

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

John M.G. Murphy, Esq.
Ober, Kaler, Grimes & Shriver
120 E. Baltimore Street, Baltimore, MD 21202-1643

410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of PACIFIC GAS AND ELECTRIC COMPANY, INC. ("PGE"), or any successor, predecessor or subsidiary, in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
3. All documents, agreements or contracts between PGE and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by PGE in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by PGE to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

UNITED STATES DISTRICT COURT

SOUTHERN

DISTRICT OF

ILLINOIS

Russian Research Center
The Kurchatov Institute

V.

SUBPOENA IN A CIVIL CASE¹

CASE NUMBER: AMD 02 CV 3878

(Pending in the United States District
Court for the District of Maryland)

Western Services Corporation

TO: Custodian of Records
Electric Energy, Inc.
2100 Portland Road
Joppa, Illinois 62953

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver
120 E. Baltimore Street
Baltimore, MD 21202-1643

DATE AND TIME

06/15/03 - 10:00 a.m.

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

John M.G. Murphy, Esq.
Ober, Kaler, Grimes & Shriver

120 E. Baltimore Street, Baltimore, MD 21202-1643

410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of ELECTRIC ENERGY, INC., or any successor, predecessor or subsidiary, in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
3. All documents, agreements or contracts between ELECTRIC ENERGY, INC., and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by ELECTRIC ENERGY, INC., in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by ELECTRIC ENERGY, INC., to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Issued by the
UNITED STATES DISTRICT COURT

DISTRICT OF Northern District of Texas

Russian Research Center
The Kurchatov Institute

V.

SUBPOENA IN A CIVIL CASE¹

Western Services Corporation

CASE NUMBER: ¹AMD 02 CV 3878

(Pending in the United States District
Court for the District of Maryland)

Custodian of Record
Texas Utilities Company, Inc.

TO: Energy Plaza
1601 Byran Street
Dallas, TX 75201

☐ **YOU ARE COMMANDED** to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☐ **YOU ARE COMMANDED** to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME

☒ **YOU ARE COMMANDED** to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

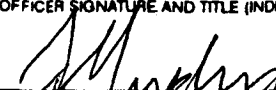
See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street Baltimore, MD 21202-1643	DATE AND TIME 06/16/03 - 10:00 a.m.
---	---

☐ **YOU ARE COMMANDED** to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
	5/14/03

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
John M.G. Murphy, Esq.
Ober, Kaler, Grimes & Shriver

120 E. Baltimore Street, Baltimore, MD 21202-1643

410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of SIMPORT (as defined above) in the possession, custody or control of TEXAS UTILITIES COMPANY INC. ("TEXAS UTILITIES"), in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, relating to or reflecting the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts.
3. All documents, agreements or contracts between TEXAS UTILITIES and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by TEXAS UTILITIES in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by TEXAS UTILITIES to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Issued by the
UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NORTH CAROLINA

Russian Research Center
The Kurchatov Institute

V.

Western Services Corporation

SUBPOENA IN A CIVIL CASE

CASE NUMBER: 'AMD 02 CV 3878
(Pending in the United States District
Court for the District of Maryland)

TO: Custodian of Records
Progress Energy, Inc.
P.O. Box 1551
Raleigh, NC 27602-1551

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
---------------------	---------------

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street Baltimore, MD 21202-1643	DATE AND TIME 6/30/03 10:00 am
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☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
---	------

ISSUING OFFICER'S NAME ADDRESS AND PHONE NUMBER John M.G. Murphy, Esq. Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street, Baltimore, MD 21202-1643	410-347-7334
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(See Rule 45, Federal Rules of Civil Procedure Parts C & D on Reverse)

If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of SIMPORT (as defined above) in the possession, custody or control of TENNESSEE VALLEY AUTHORITY, in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, relating to or reflecting the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts.
3. All documents, agreements or contracts between TENNESSEE VALLEY AUTHORITY and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by TENNESSEE VALLEY AUTHORITY in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by TENNESSEE VALLEY AUTHORITY to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Issued by the
UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TENNESSEE

Russian Research Center
The Kurchatov Institute

V.

Western Services Corporation

SUBPOENA IN A CIVIL CASE'

CASE NUMBER: 'AMD 02 CV 3878
(Pending in the United States District
Court for the District of Maryland)

TO: Custodian of Records
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, TN 37902

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
---------------------	---------------

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Schedule A attached hereto.

PLACE	DATE AND TIME
Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street Baltimore, MD 21202-1643	6/30/03 10:00 AM

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
---	------

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER	
John M.G. Murphy, Esq. Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street, Baltimore, MD 21202-1643	410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of SIMPORT (as defined above) in the possession, custody or control of PROGRESS ENERGY, INC., in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, relating to or reflecting the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts.
3. All documents, agreements or contracts between PROGRESS ENERGY, INC., and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by PROGRESS ENERGY, INC., in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by PROGRESS ENERGY, INC., to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

UNITED STATES DISTRICT COURT

DISTRICT OF

Southern District of Georgia

Russian Research Center
The Kurchatov Institute

V.

Western Services Corporation

SUBPOENA IN A CIVIL CASE'

CASE NUMBER: 1 AMD 02 CV 3878

(Pending in the United States District
Court for the District of Maryland)

TO: Custodian of Record
Southern Company
270 Peachtree Street, N.W.
Atlanta, GA 30303

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver
120 E. Baltimore Street
Baltimore, MD 21202-1643

DATE AND TIME
06/16/03 - 10:00 a.m.

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

John M.G. Murphy, Esq.
Ober, Kaler, Grimes & Shriver

120 E. Baltimore Street, Baltimore, MD 21202-1643

410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of SOUTHERN COMPANY or any successor, predecessor or subsidiary, in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
3. All documents, agreements or contracts between SOUTHERN COMPANY and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by SOUTHERN COMPANY in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by SOUTHERN COMPANY to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

UNITED STATES DISTRICT COURT

DISTRICT OF Southern District of Georgia

Russian Research Center
The Kurchatov Institute

V.

Western Services Corporation

SUBPOENA IN A CIVIL CASE'

CASE NUMBER: 1 AMD 02 CV 3878

(Pending in the United States District
Court for the District of Maryland)

TO: Custodian of Record
Georgia Power
241 Ralph McGill Boulevard, N.E.
Atlanta, GA 30308

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
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☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Schedule A attached hereto.

PLACE	DATE AND TIME
Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street Baltimore, MD 21202-1643	06/16/03 - 10:00 a.m.

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
----------	---------------

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT).

DATE

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

John M.G. Murphy, Esq.

Ober, Kaler, Grimes & Shriver

120 E. Baltimore Street, Baltimore, MD 21202-1643

410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of the simulation software known as AIS , '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of GEORGIA POWER or any successor, predecessor or subsidiary, in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
3. All documents, agreements or contracts between GEORGIA POWER and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by GEORGIA POWER in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by GEORGIA POWER to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

UNITED STATES DISTRICT COURT

Vermont

DISTRICT OF

Russian Research Center
The Kurchatov Institute

V.

Western Services Corporation

SUBPOENA IN A CIVIL CASE¹

CASE NUMBER: AMD 02 CV 3878

(Pending in the United States District
Court for the District of Maryland)

TO:

Custodian of Record
Vermont Yankee Nuclear Power Corporation
RD 5, Box 169 Ferry Road
Brattleboro, VT 53010

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver
120 E. Baltimore Street
Baltimore, MD 21202-1643

DATE AND TIME

06/16/03 - 10:00 a.m.

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

John M. C. Murphy, Esq.

Ober, Kaler, Grimes & Shriver

120 E. Baltimore Street, Baltimore, MD 21202-1643

410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of VERMONT YANKEE NUCLEAR POWER CORPORATION, in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
3. All documents, agreements or contracts between VERMONT YANKEE NUCLEAR POWER CORPORATION and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by VERMONT YANKEE NUCLEAR POWER CORPORATION in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by VERMONT YANKEE NUCLEAR POWER CORPORATION to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Issued by the
UNITED STATES DISTRICT COURT

DISTRICT OF NEW HAMPSHIRE

Russian Research Center
 The Kurchatov Institute

V.

Western Services Corporation

SUBPOENA IN A CIVIL CASE¹

CASE NUMBER: AMD 02 CV 3878

(Pending in the United States District
 Court for the District of Maryland)

TO: Custodian of Records
 North Atlantic Energy Corporation
 1000 Elm Street
 Manchester, NH 03105

☐ **YOU ARE COMMANDED** to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☐ **YOU ARE COMMANDED** to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME

☒ **YOU ARE COMMANDED** to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):


See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street Baltimore, MD 21202-1643	DATE AND TIME 06/26/03 10:00 a.m.
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☐ **YOU ARE COMMANDED** to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
	5/27/03

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
 John M.G. Murphy, Esq.
 Ober, Kaler, Grimes & Shriver

120 E. Baltimore Street, Baltimore, MD 21202-1643

410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

1. All versions of SIMPORT (as defined above) in the possession, custody or control of NORTH ATLANTIC ENERGY CORPORATION, in each format that such versions are retained.
2. All memos, email, correspondence, notes and other documents referring to, relating to or reflecting the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts.
3. All documents, agreements or contracts between NORTH ATLANTIC ENERGY CORPORATION and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
4. All documentation supporting any joint funding activity by NORTH ATLANTIC ENERGY CORPORATION in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
5. All documentation related to any payments made by NORTH ATLANTIC ENERGY CORPORATION to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.